

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO.
	§	
\$19,800.00 IN U.S. CURRENCY	§	
Defendant,	§	

VERIFIED COMPLAINT FOR FORFEITURE IN REM

The United States of America, Plaintiff, files this action for forfeiture against \$19,800.00 in United States currency, Defendant in rem, and alleges the following on information and belief.

Nature of the Action

1. This is an action to forfeit Defendants in rem to the United States pursuant to 31 U.S.C. § 5317(c)(2).

Defendant in Rem

2. Defendant in rem consist of approximately \$19,800.00 in United States currency that was seized from Ravindra Bharamaraddi on March 31, 2010, at the Bush Intercontinental Airport, Houston, Texas.

Jurisdiction and Venue

3. This Court has jurisdiction pursuant to 28 U.S.C. §1355(a) because this is an action for forfeiture.

4. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395(a) and (b) because:

- a) the acts or omissions giving rise to the forfeiture occurred in the Southern District of Texas,
- b) the property was found and is located in the Southern District of Texas, and
- c) this forfeiture action accrued in the Southern District of Texas.

Basis for Forfeiture

5. The Defendant in rem is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2) which provides that any property involved in violations of 31 U.S.C. §§ 5316 and 5324(c) may be forfeited to the United States. Under 31 U.S.C. § 5316(a)(1)(B), a person or an agent or bailee of the person shall file a report under subsection (b) of this section when the person, agent, or bailee knowingly transports, is about to transport, or has transported, monetary instruments of more than \$10,000 at one time to a place in the United States from or through a place outside the United States. Under 31 U.S.C. § 5324(c)(2) no person shall, for the purpose of evading the reporting requirements of section 5316, fail to file a report required by section 5316.

Also, 31 U.S.C. § 5324(c)(2) provides that no person shall, for the purpose of evading the reporting requirements of section 5316, file a report that contains a material omission or misstatement of fact. United States currency is a monetary instrument under 31 U.S.C. §5312(a)(3)(A).

Facts

6. On March 31, 2010, Ravindra Bharamaraddi arrived into the United States from London, United Kingdom, at the Bush Intercontinental Airport, Houston, Texas, on British Airways flight 197. During the Customs Inspection Mr. Bharamaraddi told a United States Customs and Border Protection Officer (CBP Officer) that he was carrying \$7,000 in currency. Also, he stated that he was not transporting more than \$10,000 in writing on the Customs Declaration form.

7. A CBP officer asked Mr. Bharamaraddi to place all of his money on an inspection table. Mr. Bharamaraddi took out two stacks of money and placed it on the table. The CBP Officers counted the money and the Officers counted a total of \$19,000.00. The Officers found an additional \$1,300.00 in Mr. Bharamaraddi's wallet. CBP Officers seized \$19,800 for forfeiture and returned the remainder to Mr. Bharamaraddi.

8. Mr. Bharamaraddi told the officers that he did not think it was serious to declare the money and he just wanted to save time by not filling out additional paperwork.

Relief Requested

9. Plaintiff requests: a) arrest warrants and summons, citing all persons having an interest in the Defendant property to appear on the return day of process by filing a claim and answer pursuant to Rule G(5), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, or as ordered by this Court, b) a judgment of forfeiture to the United States against the Defendant in rem, and c) costs and other relief to which the Plaintiff may be entitled.

Date: April 15, 2010.

Respectfully submitted,

José Angel Moreno
United States Attorney

By: /s/ Albert Ratliff
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VERIFICATION

I, Hector Villarreal, Senior Special Agent, United States Immigration and Customs Enforcement, declare under penalty of perjury as provided by 28 U.S.C. §1746 that I have read this Verified Complaint for Forfeiture in Rem, and the facts stated in this complaint are true and correct to the best of my knowledge and belief.
Executed on April 15, 2010.

A handwritten signature in black ink, appearing to read 'H. Villarreal', is written over a horizontal line.

Hector Villarreal, Senior Special Agent
U. S. Immigration and Customs Enforcement